

Message

From: Huang, Judy [Huang.Judy@epa.gov]
Sent: 12/11/2018 5:53:42 PM
To: Chesnutt, John [Chesnutt.John@epa.gov]; Benson, Michele [Benson.Michele@epa.gov]
Subject: FW: HPS Draft Final Risk Management Plan Revision 1 - final redline check
Attachments: RTC Table - RMP Revision 1_Final.Redline__2018-11-14.docx; DraftFinal RMP Rev 1_Redline_Nov 8 Meeting edits.docx; APPENDIX E__November 8_2018 meeting revisions.docx; Appendix C_rev.rd_November.2018(RB).docx

Hi John and Michele:

I am mostly fine with the City's response to our comments.
However, I have an issue with the changes they made (or not made) in response to our SC#11.
It is technically correct, but confusing.

This has to do with Parcel G areas subject to special protocols.

City Revised Response, 11/7/18:

Please also see response to DTSC comments 2 and 5.

Appendix C, Section 1.3.3 addresses only the special protocols that apply to certain identified locations at the Shipyard. There are no known areas with COCs in soil above RGs or PSC subject to special protocols in Parcel G. To avoid confusion, as part of the streamlining of the document, which included moving Site Conditions to Appendix C, the subsections on special protocols that did not apply for a particular parcel were deleted. This deletion was made in the April 2017 revision of the RMP.

Based on their response above, one would assume that there are no special protocols applicable to Parcel G. The problem is that Appendix C, Section 1.3.3 and subsections actually contains special protocols base on other criteria (ex. Groundwater above RG, ARICS etc.)

I called and discussed this issue with Amy.
She agreed with me that it is confusing and have committed to revise the response to EPA comments to clarify that for Parcel G, there are no special protocols triggered by the soil exceedance of the RGs or PSC. However, there are special protocols applicable to Parcel G triggered by other concerns.

Amy promised to send us a revised RTC and/or document soon.

Michele, please let me know if you have any questions.

Thank you.

Judy

From: Brownell, Amy (DPH) <amy.brownell@sfdph.org>
Sent: Wednesday, December 5, 2018 5:58 PM
To: Huang, Judy <Huang.Judy@epa.gov>; juanita.bacey@dtsc.ca.gov; tina.low@waterboards.ca.gov; Chesnutt, John <Chesnutt.John@epa.gov>
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Subject: HPS Draft Final Risk Management Plan Revision 1 - final redline check

Judy, John, Nina and Tina:

Thank you so much for your emailed comments and the discussion we had at our November 7 meeting. We have revised the RMP documents and the RTC accordingly. Can you do one final check of the attached redlines to verify that we've incorporated or explained adequately all the issues we discussed on November 7?

Since this is a final redline check, I don't think I'm being too pushy to ask if you could do this before our December 12 conference call so we can get concurrence on producing the final document.

Once we get your concurrence, we'll fix the needed formatting (e.g. accept changes, fix dates, footers, remove draft, pagination, etc) and issue the final complete RMP Revision 1!

And then it can sit on the shelf until we get ready for the next transfer, whenever that may be. (sigh)

We sure do appreciate everyone's hard work in getting this document finalized.

sincerely,

Amy Brownell, P.E.

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